

UNITED STATES OF AMERICA
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
BENJAMIN ESPINOZA)

CRIMINAL NO. 05M-1014-JGD

FILED
CLERKS OFFICE
2005 MAR -4 P 1:25
DISTRICT COURT
DISTRICT OF MASS

MOTION TO ENLARGE TIME FOR FILING SECURED BOND

The Defendant, Benjamin Espinoza, hereby moves this Honorable Court to enlarge the time for the filing of the secured bond required as a condition of his release. Defense counsel has spoken with AUSA Robert Richardson, who has no objection to the motion. The Defendant states the following grounds in support of his motion:

1. On February 18, 2005, after hearing, this Court modified the conditions of the defendant's release and allowed him to post \$10,000.00 cash bail, with the condition that he provide a secured bond in the amount of \$25,000.00 within two weeks. The two-week period ends on March 4, 2005.
2. The defendant has executed an appearance bond and obtained an appraisal of the property. He has received the court's form escrow agreement and mortgage and will be executing those documents shortly. In addition, defense counsel has forwarded to AUSA Robert Richardson the escrow agreement, as it will have to be signed by a representative of the United States Attorney's Office, and he has forwarded it to the appropriate people. The parties need additional time to have all the documents executed, exchanged, and transmitted to Texas and back for recording at the registry of deeds and filing with the Court.

WHEREFORE, the Defendant respectfully requests this Honorable Court to extend the time for filing the secured bond up to and including March 14, 2005.

Respectfully submitted,

BENJAMIN ESPINOZA

By his Attorney



Leslie Feldman-Rumpler, Esq.

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CERTIFICATE OF SERVICE

The undersigned, counsel for the defendant, hereby certifies that the within document has been served on all parties of interest.

3/3/05
Date

3/3/05
Leslie Feldman-Rumpler, Esq.